

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

MARIO PILLCO-MOROCHO, ABDOULAYE)
FALL, DARLIN GUILLERMO, JUAN CARLOS)
ILICACHI SHIGLA, DIEGO GALINDO,)
SEGUNDO ARMIJOS, DIEGO ARMANDO)
GULLÁN TIXI, MIGUEL LUCAS IXCUNA)
YAX, LLOYD WAFULA, CONROY)
DESMOND LEWIS, CARLOS MENJIVAR)
ROJAS, NUELSON GOMES, FLAVIO)
ANDRADE PRADO JUNIOR, JANITO DE)
CARVALHO, JOAO FERNANDES, AIRES DA)
GRACA, and MARCO BATTISTOTTI,)

Plaintiffs,

v.

BRISTOL COUNTY SHERIFF’S OFFICE;)
SHERIFF THOMAS HODGSON, in his)
individual capacity; SUPERINTENDENT)
STEVEN SOUZA, in his individual capacity;)
and OFFICERS DOE #1-26, in their individual)
capacities,)

Defendants.

Case No.: 1:22-cv-10652

PARTIES’ STIPULATED ADDENDUM TO PROTECTIVE ORDER

On February 16, 2024, this Court entered the Parties’ Stipulated Protective Order in this case. *See* Dkt. 78. As part of the discovery process in this case, the Parties have identified additional material that should be covered by the terms and conditions of the Protective Order as “CONFIDENTIAL—ATTORNEYS EYES ONLY” and as if fully contained therein originally.

Those items are as follows:

1. Emergency Management Plans or other similar security documents covering Defendants’ responses to major uprisings or other major events at the Bristol County House of Corrections.

By submitting this Stipulation, the Parties intend that the above items will be fully and completely incorporated into and covered by all terms of the existing Protective Order, Dkt. 78,

from this point forward in this litigation. The terms of the Order in Dkt. 78 will cover all disputes about the confidentiality of the above-referenced materials and all obligations to protect those materials throughout and after the litigation.

Dated: March 21, 2025

Respectfully submitted,

/s/Miriam R. Nemeth

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Lillian Novak, *admitted pro hac vice*

Lydia Wright, *admitted pro hac vice*

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Attorney for the Defendants

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2025, a true and accurate copy of the foregoing has been served on all counsel of record via this Court's CM/ECF electronic filing system.

/s/Miriam R. Nemeth
Miriam R. Nemeth

Dated: March 21, 2025